

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Edward Jason Dennis (Texas Bar No. 2405776) jdennis@lynnllp.com Samuel B. Hardy IV (Texas Bar No. 24074360) shardy@lynnllp.com Christian Orozco (State Bar No. 285723) corozco@lynnllp.com Lynn Pinker Cox & Hurst, LLP 2100 Ross Avenue, Suite 2700 Dallas, TX 75201 T: 214.981.3800 F: 214.981.3839 <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Corporate Recovery Associates, LLC	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION	
In re: Channel Technologies Group, LLC <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 9:16-bk-11912-DS ADVERSARY NO.: 9:18-ap-01058-DS CHAPTER: 11
Corporate Recovery Associates, LLC <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> Blue Wolf Capital Partners, LLC, et. al. <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> JOINT STATUS REPORT [LBR 7016-1(a)(2)] </div> <div style="padding-top: 10px;"> DATE: 1/7/2020 TIME: 11:30 a.m. COURTROOM: 201 ADDRESS: 1415 State Street, Santa Barbara, California 93101 </div>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | | |
|---|---|--|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):
The clerk has entered a default against Defendants Pengdi Han and Dhan, LLC. Plaintiff is in the process of filing its motion for default judgment against those Defendants.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?

Plaintiff

Plaintiff believes that it will be ready by August 2020.

Defendant

Defendants are not prepared to set a trial date and suggest that the court revisit setting a trial date at the next status conference.

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff

The case involves a number of parties so Plaintiff believes it is reasonable to allow 8 months between the status conference and trial.

Defendant

Defendants believe that this is a multi-party and complex case with large document productions from both sides (millions of pages).

3. When do you expect to complete your discovery efforts?

Plaintiff

By June 2020.

Defendant

Defendants are not prepared to set a discovery deadline and suggest that the court revisit setting that deadline at the next status conference.

4. What additional discovery do you require to prepare for trial?

Plaintiff

It is anticipated that there will be interrogatories, document requests, depositions, requests for admissions, expert discovery, and some third-party discovery.

Defendant

It is anticipated that there will be interrogatories, document requests, depositions, requests for admissions, and expert discovery.

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff

Plaintiff can present its side in 2 weeks.

Defendant

Defendants can present their side in 2-3 weeks.
Defendants Avante and Fidus are not able to determine trial time at this time.

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff

Plaintiff anticipates calling 10-15 witnesses.

Defendant

Defendants believe that it is too early to estimate the number of witnesses at trial.

3. How many exhibits do you anticipate using at trial?

Plaintiff

Plaintiff anticipates using over 100 exhibits.

Defendant

Defendants believe that it is too early to estimate the number of exhibits at trial.

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested
Reasons:

Defendant

Pretrial conference ☒ is ☐ is not requested
Reasons:

Plaintiff

Pretrial conference should be set after:
(date) _____

Defendant

Pretrial conference should be set after:
(date) _____

E. SETTLEMENT:

1. What is the status of settlement efforts?

To date, only Plaintiff's counsel and BW Piezo Holdings, LLC's counsel have engaged in settlement discussions and a mediation related to the state court proceeding. No other Defendant (including other Blue Wolf Entities) were involved in that mediation.

2. Has this dispute been formally mediated? ☐ Yes ☒ No

If so, when?

As noted above, a mediation was conducted that included Plaintiff and Defendant BW Piezo Holdings, LLC.

3. Do you want this matter sent to mediation at this time?

Plaintiff

☒ Yes ☐ No

Defendant

☒ Yes ☐ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

☐ I do consent

☒ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

Plaintiff's Response: Plaintiff anticipates a resolution of the lawsuit filed in California state court against the former managers and directors of the Debtor, as well as Defendant BWP. Given that resolution, attempts to coordinate further discovery with that lawsuit should be mooted.

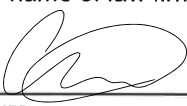
Both Plaintiff and Defendants discussed the logistics and venue of a trial in this case given the lack of consent by the Defendants and the pending jury trial demands. The parties would like to discuss with the Court as to its thoughts on this issue.

Respectfully submitted,

Date: 12/23/2019

Lynn Pinker Cox & Hurst, LLP

Printed name of law firm


Signature

Christian Orozco


Printed name

Attorney for: Corporate Recovery Associates, LLC

Date: 12/23/2019

Sklar Kirsh, LLP

Printed name of law firm


Signature

Jan S. Landsberg

Printed name

Attorney for: Grant Thornton LLP

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Respectfully submitted,

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

Date: 12/23/2019

GREENBEG TRAUER LLP
Printed name of law firm

Howard Trauer (MFD)
Signature

HOWARD J. STEINBERG
Printed name

Attorney for: Blue Wolf Capital Partners, LLC;
Blue Wolf Capital Fund II, L.P.;
Blue Wolf Capital Advisors L.P.; and
BW Piezo Holdings, LLC

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Respectfully submitted,

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

Date: 12/23/19

Taylor Strategic PC
Printed name of law firm



Signature

David A. Taylor
Printed name

Attorney for: Electro Optical Industries, Inc.

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Respectfully submitted,

Date: 12/23/2019

Barnes & Thornburg LLP

Printed name of law firm


Signature

Jonathan J. Boustani

Printed name

Attorney for: CTG Advanced Materials, LLC

CTS Corporation

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

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and/or order in this adversary proceeding.

Defendant

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Respectfully submitted,

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

Date: 12/23/19

Blank Rome LLP +
Printed name of law firm


Signature

Craig N. Haring +
Printed name

Attorney for: Defendant Gladstone Investment Corp. +

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Respectfully submitted,

Date: 12/23/19

Printed name of law firm

Brian Davidoff

Signature

Greenburg Glusker

Printed name

Attorney for: Fidus Investment Corporation,
Fidus Mezzanine Capital II, LP,
Avante Mezzanine Partners SBIC, LP,
and Avante Mezzanine Partners II, Inc.

Date: _____

Printed name of law firm

Signature

Printed name

Attorney for: _____

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2100 Ross Ave, Dallas, Texas 75201

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 12/24/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

pbenvenuti@kellerbenvenuti.com; jboustani@btlaw.com; Chang@Blankrome.com; b davidoff@greenbergglusker.com;
tkeller@kellerbenvenuti.com; ian@landsberg-law.com; steinbergh@gtlaw.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/24/19

Christian Orozco

Date

Printed Name

Signature



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